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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

**THE REPUBLIC OF THE MARSHALL  
 ISLANDS,**

Plaintiff,

v.

**THE UNITED STATES OF AMERICA, *et al.*,**

Defendants.

)  
 ) Case No. 3:14-cv-01885-JSW  
 )  
 ) **Stipulation to Set Briefing Schedule**  
 ) **and to Reschedule the Case**  
 ) **Management Conference**  
 ) and Order Thereon as Modified  
 )  
 )

The parties agree to extend the time for Defendants to respond to the Complaint and to set a briefing schedule for a motion filed pursuant to Federal Rule of Civil Procedure 12. The parties also agree, pursuant to this Court's approval, to reschedule the case management conference, currently scheduled for August 1, 2014. In support thereof, the parties state as follows:

1. Defendants' response to Plaintiff's Complaint is currently due on July 11, 2014.

1           2.       The Deputy Branch Director that is responsible for supervision of this case on  
2 behalf of the federal Defendants will be out of the office on July 11 due to previously-scheduled  
3 travel plans. Accordingly, Defendants request a short extension of 10 days to allow for the  
4 review and completion of the Defendants' response to the Complaint.

5           3.       The parties have also consulted and agreed upon a schedule for the filing of  
6 memoranda in the event that Defendants file a motion pursuant to Federal Rule of Civil  
7 Procedure 12 that would allow counsel sufficient time to consult with their clients and prepare  
8 said memoranda. Assuming the filing of such a motion, the schedule would proceed as follows:

9	Defendants' Rule 12 Motion	July 21, 2014
10		
11	Plaintiffs' Opposition	August 21, 2014
12		
13	Defendants' Reply	September 8, 2014

14       4.       This proposed briefing schedule would not affect any established deadlines.

15       5.       The Case Management Conference in this matter has been set for August 1, 2014.

16       6.       Undersigned counsel for the federal Defendants will be on previously-scheduled  
17 leave on August 1, 2014 and August 8, 2014. Therefore, counsel for Defendants will be  
18 unavailable on those dates. Accordingly, and to fully accommodate the proposed briefing  
19 schedule set forth above, the parties respectfully request to reschedule the Case Management  
20 Conference for September 12, 2014, or a time thereafter that is convenient for the Court.  
21

22  
23  
24 Dated: June 11, 2014

Respectfully submitted,

25                   STUART F. DELERY  
26                   Assistant Attorney General

27                   ANTHONY J. COPPOLINO  
28                   Deputy Branch Director

/s/ Eric R. Womack

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*Counsel for Plaintiff*

The Court shall set a case management conference, if necessary, in its order resolving the motion to dismiss.  
PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 11, 2014



Hon. JEFFREYS. WHITE

United States District Judge